

**EXHIBIT P**

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

**Drew J. Ribar,**  
Plaintiff,

v.

**State of Nevada ex rel. Nevada Department of Corrections, Carson City, et al.,**  
Defendants.

**Case No. 3:24-cv-00103-ART-CLB**

**EXHIBIT P – KEY TIMESTAMPS FROM VIDEO OF MARCH 20, 2024**

**INCIDENT (BATES NO. EX033)**

**Filed in Support of Amended Complaint and Summary Judgment Motion (Fed. R. Civ. P. 56)**

Plaintiff Drew J. Ribar, pro se, submits **Exhibit P**, which references **key timestamps from a video recorded on March 20, 2024**, at the **Carson City Sheriff's Office**. The video captures **Sgt. TJ Boggan's** actions, including detaining Plaintiff for recording, citing **Marsy's Law** as the basis for prohibiting recording in a public space. This exhibit highlights **critical moments** in the video and underscores constitutional violations related to First and Fourth Amendment rights.

**Key Timestamps and Legal Violations**

PLEADING TITLE - 1

Timestamp	Event	Legal Relevance
00:00:00 –	Plaintiff asks, “Am I	Initiates Fourth Amendment issue regarding
00:00:02	detained?”	unlawful detention.
00:00:03 –	Orders Plaintiff to “hang	Unlawful detention without probable cause or
00:00:05	out” and detains him.	reasonable suspicion.
00:04:31 –	Plaintiff identifies the	Misapplication of Marsy’s Law in a public space
00:04:35	Marsy’s Law sign.	violates First Amendment press protections.
00:05:30 –	Plaintiff confirms he is	Escalation based solely on First Amendment
00:05:32	recording.	activity—unconstitutional.
00:05:52 –		Misuse of investigatory stop statute, no
00:05:56	Cites NRS 171.1233,.	reasonable suspicion for detention.
00:06:02 –	Asserts Plaintiff is “not	Marsy’s Law misapplied to suppress recording in
00:06:02.875	allowed” to record.	a public space, violating press rights.
00:09:08 –	Plaintiff argues Marsy’s	Violation of press freedom under Nevada
00:09:23	Law conflicts with	Constitution—Marsy’s Law cannot restrict
	Nevada’s Art. 1, § 9.	recording in public.
00:09:49 –	Plaintiff cites federal case	Reference to federal precedents (e.g., Glik v.
00:09:55	law affirming public	Cunniffe, Fordyce v. Seattle) confirming
	recording rights.	recording rights in public spaces.

## Legal Claims Supported

PLEADING TITLE - 2

- 1 • **First Amendment (42 U.S.C. § 1983): Retaliation** for recording in public, unlawful  
2 restriction of press rights, misapplication of **Marsy's Law** to prohibit First Amendment  
3 activity in a public space.
- 4 • **Fourth Amendment (42 U.S.C. § 1983): Unlawful detainment** without reasonable  
5 suspicion or probable cause, based solely on recording.
- 6 • **Monell Liability (42 U.S.C. § 1983): Systematic suppression** of press activity and  
7 violation of constitutional rights based on CCSO's signage and enforcement of an  
8 unconstitutional recording ban.  
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### 12 **Summary Judgment Purpose (Fed. R. Civ. P. 56)**

13 The video evidence clearly shows an unlawful detention based on **First Amendment** activity—  
14 recording in a public space. No criminal activity was alleged, and **Marsy's Law** was misapplied  
15 to infringe upon **press rights**. This violation, coupled with the **First and Fourth Amendment**  
16 **violations**, leaves no genuine dispute of material fact, entitling Plaintiff to summary judgment.  
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### 21 **Qualified Immunity Defeat**

22 Defendants' actions contravene clearly established rights under **Pearson v. Callahan, 555 U.S.**  
23 **223 (2009)**. The right to record in a public space is well-established (**Glik v. Cunniffe, 655 F.3d**  
24 **78, 1st Cir. 2011; Fordyce v. Seattle, 55 F.3d 436, 9th Cir. 1995**). Defendants' misuse of  
25  
26  
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1 **Marsy's Law** to suppress recording activity clearly violates these rights, making any **qualified**  
2 **immunity** defense untenable.

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5  
6 **Authentication**

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8 I, Drew J. Ribar, declare under penalty of perjury (28 U.S.C. § 1746) that these timestamps  
9 accurately reflect events in a video I recorded on March 20, 2024, at the Carson City Sheriff's  
10 Office, Bates No. EX033.

11  
12 Dated: **March 28, 2025**

13 /s/ Drew J. Ribar

14 Drew J. Ribar

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